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Subject: General Plan Update Comments/ SDG&E

Dear Mr. Muto,

The purpose of this letter is to provide the County with suggested changes for its General Plan. More specifically, we suggest changes to the draft language of Chapter 5 of "Conservation and Open Space Element". We are hopeful that our suggested changes will help guide the County of San Diego with an energy policy that promotes the personal welfare of its citizens, adds economic vitality, and sustains or improves the sensible use of resources.

SDG&E provides the following recommendations in a format that fits the County's existing format. Specifically, our comments address the following elements:

#### **Energy & Sustainable Development**

(Replace 1<sup>st</sup> paragraph with the following two paragraphs, page 5-31)

*SDG&E is a regulated public utility that provides electric service to 3.4 million customers within a 4,100-square-mile service area that encompasses 25 cities throughout San Diego and southern Orange counties.*

*In 2003, the three key energy agencies in California - the California Energy Commission (CEC), the California Power Authority (CPA), and the California Public Utilities Commission (CPUC), came together to adopt an Energy Action Plan that identifies joint goals for California's energy future and sets forth a commitment to achieve these goals through specific actions.*

*In 2005, the CEC and the CPUC adopted a second plan, Energy Action Plan II, to reflect policy changes and actions that had ensued over the previous two years.*

*In 2008, an Energy Action Plan Status Update was released to incorporate the CEC's 2007 Integrated Energy Policy Report (IEPR), reflecting the passage of Assembly Bill 32, the California Global Warming Solutions Act of 2006. The IEPR includes advanced policies, intended to enable California to meet its energy needs in a carbon-constrained world. The report also provides a comprehensive set of recommended actions to achieve these policies. SDG&E's Long-Term Resource Plan (LTRP) sets forth a strategy of mixed resources to ensure long-term, reliable, and affordable power in the region, as established by the CPUC in Decisions D.04-09-060 and D.05-09-043. The CPUC regulates energy issues related to supply, delivery, rates, and tariffs for all SDG&E customers in the County.*

*With regard to adding modifying, operating, increasing, or adding new energy infrastructure, SDG&E follows the rules and regulations of California Public Utilities Commission, California Independent System Operators, California Energy Commission, and the Federal Department of Energy.*

### **Goals and Policies**

(Insert two new policies to "Sustainable Land Development", page 5-33)

*COS-14.14 Existing Energy Corridors. Senate Bill 2431 (SB 2431, Stats. 1988, Ch.1457) promoted state policy for efficient energy delivery and the construction of high voltage delivery. Where possible, the County supports the following:*

- a. The County finds and declares that establishing a high-voltage electricity transmission system capable of facilitating bulk transactions for both firm and non-firm energy demand, accommodating the development of alternative power supplies within the state, ensuring access to regions outside the state having surplus power available, and reliably and efficiently supplying existing and projected load growth, are vital to the future economic and social well being of California.*
- b. The County finds and declares that the construction of new high-voltage transmission lines within new rights-of-way may impose financial hardships and adverse environmental impacts on the state and its residents, so that it is in the interests of the state, through existing licensing processes, to accomplish all of the following:*
  - 1. Encourage the use of existing rights-of-way by upgrading existing transmission facilities where technically and economically justifiable.*
  - 2. When construction of new transmission lines is required, encourage expansion of existing right-of-way, when technically and economically feasible.*
  - 3. Provide for the creation of new rights-of-way when justified by environmental, technical, or economic reasons as determined by the appropriate licensing agency.*
  - 4. Where there is a need to construct additional transmission capacity, seek agreement among all interested utilities on the efficient use of that capacity.*

*COS-14.15 State & Federal Designated Energy Corridors. The California Energy Commission and the Federal Department of Energy have regulatory responsibilities to improve transmission access to and throughout California. These responsibilities are mandated through AB 1059 and Section 368 of the National Energy Act of 2005. The County supports these regional and national efforts.*

Thank you for allowing SDG&E this opportunity to comment. Should you wish to discuss these recommendations further, please don't hesitate to contact me.

Sincerely,



Tom G. Acuna  
SDG&E Land Planning Supervisor

## **Summary of Senate Bill 2431 (SB 2431, Stats. 1988, Ch. 1457)**

### **Electric Utility Transmission Line Rights-of-Way Study**

Transmission congestion and electricity reliability problems have traditionally been met by expansion of the electrical transmission system. Obtaining permission to expand existing transmission rights-of-way or siting new transmission rights-of-way has been and continues to be a very difficult and controversial process. There are numerous entities (e.g., investor-owned utilities, independent power developers, transmission-dependent utilities, and transmission-owning utilities) involved in transmission planning, all with varying needs. The Legislature, in an effort to avoid single-purpose transmission lines where possible and facilitate effective coordinated long-term transmission line corridor planning, approved Senate Bill 2431 (SB 2431, Stats. 1988, Ch. 1457) which required a number of studies to be prepared and included in the Energy Commission's 1990 Electricity Report. The bill also made two general findings concerning the role of transmission in California's future development:

- a. The Legislature hereby finds and declares that establishing a high-voltage electricity transmission system capable of facilitating bulk transactions for both firm and nonfirm energy demand, accommodating the development of alternative power supplies within the state, ensuring access to regions outside the state having surplus power available, and reliably and efficiently supplying existing and projected load growth, are vital to the future economic and social well being of California.
- b. The Legislature further finds and declares that the construction of new high-voltage transmission lines within new rights-of-way may impose financial hardships and adverse environmental impacts on the state and its residents, so that it is in the interests of the state, through existing licensing processes, to accomplish all of the following:
  1. Encourage the use of existing rights-of-way by upgrading existing transmission facilities where technically and economically justifiable.
  2. When construction of new transmission lines is required, encourage expansion of existing right-of-way, when technically and economically feasible.
  3. Provide for the creation of new rights-of-way when justified by environmental, technical, or economic reasons as determined by the appropriate licensing agency.
  4. Where there is a need to construct additional transmission capacity, seek agreement among all interested utilities on the efficient use of that capacity.

Neither the need for transmission expansion nor the controversies surrounding expansion have diminished since the Legislature's transmission corridor siting findings were made. The Energy Commission believes that these principles are still important today and must be considered when planning for the expansion of transmission corridors.